

AFFIDAVIT OF DAVE DORMIRE

I, Dave Dormire, being first duly sworn, states as follows:

1. I am over 18 years of age and competent to make this statement.
2. I am currently employed as the Director of the Division of Adult of Institutions (DAI) for the Missouri Department of Corrections. I have been in this position since September 2011.
3. As the Director of DAI, I am responsible for the general supervision, management and control of the division. As part of my duties, I have personal knowledge of the Department's execution protocol and related procedures.
4. On October 18, 2013, the Department adopted a new execution protocol. Pursuant to the protocol, five grams of pentobarbital will be injected intravenously.
5. The October 18, 2013, execution protocol states:

Medical personnel shall determine the most appropriate locations for intravenous (IV) lines. Both a primary IV line and a secondary IV line shall be inserted unless the prisoner's physical condition makes it unduly difficult to insert more than one IV. Medical personnel may insert the primary IV line as a peripheral line or as a central venous line (e.g., femoral, jugular, or subclavian) provided they have appropriate training, education, and experience for that procedure. The secondary IV line is a peripheral line.
6. If the prisoner's medical condition allows, both the primary and secondary lines will be inserted as peripheral lines. The Department will only utilize a central venous line if the prisoner's medical condition makes placing a peripheral line impracticable.

Exhibit "D"

FURTHER AFFIANT SAYETH NOT.



Dave Dormire

Subscribed and sworn before me, a Notary Public in and for said County and State, on
this 15 day of November, 2013.



Notary Public

My commission expires:

